

EXHIBIT C

Toth, Ashley L.

From: Toth, Ashley L.
Sent: Friday, October 4, 2024 3:27 PM
To: Yatvin, Alan; Andrew Shubin; Santarone, Joseph J.
Cc: Cohen, Noah S; Pogolowitz, Rachel
Subject: RE: Plaintiff's Response to Defendant's RFPD's

Alan,

Our responses to RPD were provided to you approximately 4 months ago and your office downloaded the file. If you are missing that from the file, I can re-provide the documents. They are bates stamped Calderaio001-896. Please confirm.

**Ashley L. Toth**

Attorney at Law

15000 Midlantic Drive, Suite 200, P.O. Box 5429, Mount Laurel, NJ 08054
Direct: (856) 414-6400 | Main: (856) 414-6000 | Fax: (856) 414-6077
[bio](#) | [e-mail](#) | [website](#)

This e-mail transmission and any documents, files or previous e-mail messages attached to it, are confidential and are protected by the attorney-client privilege and/or work product doctrine. If you are not the intended recipient, or a person responsible for delivering it to the intended recipient, you are hereby notified that any review, disclosure, copying, dissemination, distribution or use of any of the information contained in, or attached to this e-mail transmission is STRICTLY PROHIBITED. If you have received this transmission in error, please immediately notify me by forwarding this e-mail to ALToth@MDWCG.com, or by telephone at (856) 414-6400 and then delete the message and its attachments from your computer.

From: Yatvin, Alan <cayatvin@wgpllp.com>
Sent: Friday, October 4, 2024 2:58 PM
To: Toth, Ashley L. <ALToth@MDWCG.com>; Andrew Shubin <shubin@shubinlaw.com>; Santarone, Joseph J. <JJ.Santarone@MDWCG.com>
Cc: Cohen, Noah S <ncohen@wgpllp.com>; Pogolowitz, Rachel <rpogolowitz@wgpllp.com>
Subject: RE: Plaintiff's Response to Defendant's RFPD's

WARNING: This email originated outside Marshall Dennehey. BE CAUTIOUS before clicking any link or attachment.

Ashely-

We will get back to you on depositions. We have scheduling issues. Also, you are seeking to depose well in excess of the 10 deposition limit under the rules, contrary to the representation made in the Rule 26(f) report to the Court, without even seeking to discuss this with us.

In the meantime, we cannot proceed with actually holding depositions until you have provided responses to our **March 1st** RFP, where you have still not provided the production you were withholding pending a confidentiality order, which was approved by the Court **May 28, 2024**. There have been several follow-ups asking for status of this production with no response. If we don't get a prompt commitment for when in the very near future this long overdue production will be provided, we are going to have ask the Court to intervene.

Please feel free to call if you would like to discuss.

Alan

Alan L. Yatvin
Attorney at law

PLEASE NOTE NEW FIRM NAME AND EMAIL ADDRESS

Phone 215.665-8181 | Fax: 215.665.8464

Email: ayatvin@wgpllp.com

www.wgpllp.com

Weir Greenblatt Pierce LLP

1339 Chestnut Street | Suite 500
Philadelphia, PA 19107

 Consider your responsibility to the environment - think before you print!

From: Toth, Ashley L. <ALTOTH@MDWCG.COM>
Sent: Wednesday, October 2, 2024 1:24 PM
To: Andrew Shubin <shubin@shubinlaw.com>; Santarone, Joseph J. <JJSANTARONE@MDWCG.COM>
Cc: Cohen, Noah S <ncohen@wgpllp.com>; Yatvin, Alan <ayatvin@wgpllp.com>
Subject: [EXTERNAL] RE: Plaintiff's Response to Defendant's RFPD's

This Message originated outside your organization.

Good afternoon all,

Attached please find Defendant's deposition list. Please confirm your office's availability and whether you will be producing the following individuals for deposition.

Thank you,
Ashley



Ashley L. Toth

Attorney at Law

15000 Midlantic Drive, Suite 200, P.O. Box 5429, Mount Laurel, NJ 08054
Direct: (856) 414-6400 | Main: (856) 414-6000 | Fax: (856) 414-6077

[bio](#) | [e-mail](#) | [website](#)

This e-mail transmission and any documents, files or previous e-mail messages attached to it, are confidential and are protected by the attorney-client privilege and/or work product doctrine. If you are not the intended recipient, or a person responsible for delivering it to the intended recipient, you are hereby notified that any review, disclosure, copying, dissemination, distribution or use of any of the information contained in, or attached to this e-mail transmission is STRICTLY PROHIBITED. If you have received this transmission in error, please immediately notify me by forwarding this e-mail to ALTOTH@MDWCG.COM, or by telephone at (856) 414-6400 and then delete the message and its attachments from your computer.

From: Andrew Shubin <shubin@shubinlaw.com>
Sent: Thursday, September 19, 2024 3:00 PM
To: Santarone, Joseph J. <JJSANTARONE@MDWCG.COM>; Toth, Ashley L. <ALTOTH@MDWCG.COM>
Cc: ncohen@wgpllp.com; Yatvin, Alan <ayatvin@wgpllp.com>
Subject: Plaintiff's Response to Defendant's RFPD's

WARNING: This email originated outside Marshall Dennehey. BE CAUTIOUS before clicking any link or attachment.

Joe and Ashley

I attach plaintiff's objections and response to defendant's first document request. You can access the production using this link: <https://www.dropbox.com/scl/fo/dl17of4dsjkyxp6tz688q/AGRJ384SvK9rUhg5e4Wdsgl?rlkey=vu3miriav6agnm2wvb391sjs3&st=xf4z15y5&dl=0>

The password is: Pw: 2:23-cv-04218-MSG

The link expires 10/19/24

Sorry for the delay. We are still waiting for defendant's response to our RFPD. Can you please touch base with us over the next day or two regarding defendant's outstanding responses?

Thanks for your attention to this matter.

Best, Andy

Andrew Shubin
Shubin Law Inc.
310 South Burrowes Street
State College, PA 16801
(814) 867 3115
Fax: (814) 867-8811
shubin@shubinlaw.com
www.shubinlaw.com

This electronic mail transmission is privileged and confidential, and is intended only for the review of the party or parties to whom it is intended to be sent. If you have received this message in error, please immediately return it to the sender with a notation of "Wrong Address" in the subject line, then delete it from your computer system. Unintended transmission to a wrong address shall not constitute a waiver of the attorney-client or any other privileges. Thank you for your cooperation.
